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**ATTORNEY FOR HENRY CLAY CARR, JR**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

**IN RE:**  
**HENRY CLAY CARR, JR**

**BANKRUPTCY CASE**  
**18-44306-7**

**DEBTOR**

**CHAPTER 7**

**APPLICATION FOR ORDER ENLARGING THE TIME TO**  
**FILE A REAFFIRMATION AGREEMENT**

TO THE HONORABLE JUDGE UNITED STATES BANKRUPTCY JUDGE:

Henry Clay Carr, Jr asks the Court to extend the deadline for them to file documents in this matter and would respectfully show the Court as follows:

**STATUS OF BANKRUPTCY CASE**

1.

Applicant is Henry Clay Carr, Jr, the above-named Debtor, who filed a voluntary petition for relief under Chapter 7 of Title 11 of the United States Code on November 2, 2018.

2.

The Section 341 Meeting of Creditors was held on December 19, 2018 and this case will be ready for discharge on February 18, 2019.

**REAFFIRMATION OF DEBT WITH ASTERA CREDIT UNION**

3.

Applicant has a vehicle which was purchased through a loan from Astera Credit Union. The Statement of Intentions state the applicant will retain the property and reaffirm the loan. The Reaffirmation Agreement once received will be immediately signed and return to Astera Credit Union for filing.

4.

The Reaffirmation Agreement between Applicants and Astera Credit Union is not expected to be filed until later than 30 days from the date of the filing of this motion.

5.

Pursuant to Federal Rule of Bankruptcy Procedure 4008(a), the Court may enlarge the time to file a reaffirmation agreement. Pursuant to Federal Rule of Bankruptcy Procedure 4004(c)(1)(J) the discharge should not be entered while this Application is pending.

#### **PERIOD OF EXTENSION REQUESTED**

6.

Applicant, in good faith, believes the Reaffirmation Agreement with Astera Credit Union will be filed before March 20, 2019. Applicants request that the Court enter an Order Extending Time for Filing their Reaffirmation Agreement until April 20, 2019.

#### **LIMITED NOTICE**

7.

Marilyn Garner, the Chapter 7 Trustee, has been appointed in this case. Notice of this Application to the Chapter 7 Trustee, the United States Trustee and the parties that have requested notice in this case will be sufficient.

**PRAYER**

**WHEREFORE, PREMISES CONSIDERED,** Applicant Henry Clay Carr, Jr, prays that this Court make an Order extending the deadline to file their Reaffirmation Agreement with Astera Credit Union, and that Applicants be granted such other and further relief as is just.

Respectfully submitted,  
ALVIN Q. MALONE  
By: /s/ Alvin Q. Malone  
Alvin Q. Malone  
State Bar No. 24085446

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**CERTIFICATE OF SERVICE**

I, Alvin Q. Malone, do hereby certify that a true and correct copy of the above and foregoing Application for Order Enlarging the Time to File a Reaffirmation Agreement was served on the date that the instrument was filed electronically. Service was accomplished electronically and/or by first class mail to the following:

Marilyn Garner  
2007 E Lamar Blvd #200  
Arlington, TX 76006

United States Trustee  
Room 9-C-60  
1100 Commerce Street  
Dallas, Texas 75242

By: /s/ Alvin Q. Malone  
Alvin Q. Malone